

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

William Lawson

Case No.

2:19-mj-307

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of (various; see affidavit) in the county of Franklin in the Southern District of Ohio, the defendant(s) violated:

Code Section

42 U.S.C. sec. 408(a)(7)(B)

Offense Description

False Representation of Social Security Number

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 4-17-2019

City and state: Columbus, Ohio



Complainant's signature

Criminal Investigations Agent Anthony M. Cable

Printed name and title



Elizabeth Preston Deavers, Chief U.S. Magistr. Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Anthony M. Cable, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I have been a sworn police officer in the State of Ohio since 2009 through present and I have worked as a Criminal Investigations Agent for the Ohio Department of Taxation – Criminal Investigation Division since 2013. My responsibilities include investigation of felony tax fraud, identity theft, and other financial crimes. In 2018, I was federally deputized and became a member of the Southern District of Ohio Task Force (SDOHTF), which is operated by the United States Secret Service.

2. I make this Affidavit in support of an application for a criminal complaint and arrest warrant for WILLIAM LAWSON, for a violation of 42 U.S.C. § 408(a)(7)(B). The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This Affidavit is intended to show there is sufficient probable cause for the charges in the complaint and does not set forth all of my knowledge about this matter. I have set forth only the facts I believe are necessary to establish probable cause that LAWSON has violated 42 U.S.C. § 408(a)(7)(B).

STATUTORY AUTHORITY

3. This investigation concerns alleged violations of 42 U.S.C. § 408(a)(7)(B), which criminalizes the false representation of a Social Security number with intent to deceive.¹

¹ The statute states, in relevant part: “Whoever . . . for the purpose of obtaining anything of value from any person, or for any other purpose . . . with intent to deceive, falsely represents a number to be the social security account number assigned by the Commissioner of Social Security to him or to another person, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him or to such other person . . . [shall be punished].”

PROBABLE CAUSE

4. The defendant's true identity is WILLIAM LAWSON, and his Social Security number (SSN) is xxx-xx-3835. The Social Security Administration has verified that this is LAWSON's SSN. This SSN is also associated with LAWSON's Ohio driver's license (no. xxxx8716).

LAWSON's Use of SSN xxx-xx-1009

5. On or about January 22, 2017, LAWSON applied for credit to purchase a Hyundai Sonata at Dennis Hyundai in Columbus. On the application, LAWSON used his true name and date of birth, and the dealership photocopied his Ohio driver's license (no. xxxx8716). But LAWSON listed his SSN as xxx-xx-1009, which is not his true SSN. According to the Social Security Administration, this number has been assigned to someone else. When the dealership ran a credit check, it returned a score of 763. LAWSON was approved, and he financed \$30,455.16. The loan appears on an Experian credit report for WILLIAM LAWSON under SSN xxx-xx-1009.

LAWSON's Use of SSN xxx-xx-3672

6. On or about June 29, 2018, LAWSON applied for credit to purchase a 2016 Chevrolet Camaro at Jeff Wyler Chevrolet in Canal Winchester. On the application, LAWSON used his true name and date of birth, and the dealership photocopied his Ohio driver's license (no. xxxx8716). But LAWSON listed his SSN as xxx-xx-3672, which is not his true SSN. According to the Social Security Administration, this number has been assigned to someone else. When the dealership checked LAWSON's credit under this false SSN, the dealership received a credit report indicating a "low level of risk." LAWSON also submitted purported pay stubs from

Government Liquidation. He was approved, and he financed \$24,563.68. The loan appears on an Experian credit report for WILLIAM LAWSON under SSN xxx-xx-3672.

7. On or about July 16, 2018, LAWSON applied for credit to purchase a 2018 Chevrolet Camaro at Jack Maxton Chevrolet in Worthington. On the application, LAWSON used his true name and date of birth, and the dealership photocopied his Ohio driver's license (no. xxxx8716). But LAWSON listed his SSN as xxx-xx-3672, which is the same false SSN he used to buy the car at Jeff Wyler a few weeks earlier. He was approved, and he financed \$27,283.30. The loan appears on an Experian credit report for WILLIAM LAWSON under SSN xxx-xx-3672.

LAWSON's Use of SSN xxx-xx-3357

8. On or about August 27, 2018, LAWSON applied for credit to purchase a 2015 Chevrolet Camaro at Mark Wahlberg Chevrolet in Columbus. On the application, LAWSON used his true name and date of birth, and the dealership photocopied his Ohio driver's license (no. xxxx8716). But LAWSON listed his SSN as xxx-xx-3357, which is not his true SSN. According to the Social Security Administration, this number has been assigned to someone else. When the dealership checked LAWSON's credit under this false SSN, the dealership received a credit report indicating a credit score of 704. LAWSON also submitted purported pay stubs from Government Liquidation, which were formatted differently and listed a different employee ID number than the purported pay stubs from Government Liquidation that LAWSON submitted to Jeff Wyler. LAWSON was approved, and he financed \$24,398.13. The loan appears on an Experian credit report for WILLIAM LAWSON under SSN xxx-xx-3357.

9. On or about September 13, 2018, LAWSON applied for credit to purchase a 2018 Honda Civic at Hugh White Honda in Columbus. On the application, LAWSON used his true

name and date of birth, and the dealership photocopied his Ohio driver's license (no. xxxx8716). But LAWSON listed his SSN as xxx-xx-3357, which is the same false SSN he used at Mark Wahlberg Chevrolet a couple weeks earlier. LAWSON also submitted purported pay stubs from Government Liquidation, which were formatted differently than the purported pay stubs from Government Liquidation he had submitted to Mark Wahlberg Chevrolet. LAWSON was approved, and he financed \$26,091.50. The loan appears on an Experian credit report for WILLIAM LAWSON under SSN xxx-xx-3357.

10. On or about September 29, 2018, LAWSON applied for credit to purchase a 2005 Chevrolet Colorado at Hatfield Used Car Center in Columbus. On the application, LAWSON used his true name and date of birth, and the dealership photocopied his Ohio driver's license (no. xxxx8716). But LAWSON listed his SSN as xxx-xx-3357, which is the same false SSN he used at Mark Wahlberg Chevrolet and Hugh White Honda. When the dealership checked LAWSON's credit under this false SSN, the dealership received a credit report indicating a credit score of 708. LAWSON also submitted purported pay stubs from Government Liquidation, which listed the same pay date (9-7-2018) as the purported pay stub he submitted to Hugh White Honda, but with a different employee ID number and different check number. LAWSON was approved, and he financed \$11,541.12. The loan appears on an Experian credit report for WILLIAM LAWSON under SSN xxx-xx-3357.

LAWSON's Use of SSN xxx-xx-8979


11. On or about January 11, 2019, LAWSON applied for credit to purchase a 2014 Kia Optima at Dennis Hyundai in Columbus. On the application, LAWSON used his true name and date of birth and the dealership photocopied his Ohio driver's license (no. xxxx8716). But LAWSON listed his SSN as xxx-xx-8979, which is not his true SSN. According to the Social

Security Administration, this number has been assigned to someone else. When the dealership ran a credit report, it returned a credit score of 727. LAWSON also submitted purported pay stubs from Government Liquidation. He was approved, and he financed \$12,650.53.

CONCLUSION

12. Based on the information above, I respectfully submit that there is probable cause to believe that LAWSON violated 42 U.S.C. § 408(a)(7)(B) on or about January 22, 2017, June 29, 2018, July 16, 2018, August 27, 2018, September 13, 2018, September 29, 2018, and January 11, 2019. I respectfully request that the Court authorize the complaint and issue an arrest warrant.

Respectfully submitted,



Anthony M. Cable
Criminal Investigations Agent

Subscribed and sworn to before me on April 11, 2019



HON. ELIZABETH PRESTON DEAVERS
CHIEF UNITED STATES MAGISTRATE JUDGE

